

IN THE UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH,)
)
)
Plaintiff,) CIVIL ACTION
) FILE NO. 1:24-CV-05158-TWT
vs.)
)
DEPUTY MONIQUE TRACEY, et al,)
)
Defendants.)
-----/

Deposition of RAUL GOMEZ, taken on behalf of
PLAINTIFF, pursuant to the stipulations set forth below,
before Meg Armistead, Certified Court Reporter, at 2970
Clairmont Road, Suite 650, Atlanta, Georgia, commencing
at the hour of 1:00 p.m., Wednesday, October 8, 2025.

BULL & ASSOCIATES, INC.
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(In the following transcript, dashes [---] are
used to indicate an intentional or purposeful
interruption of a sentence, and ellipsis [...] is used
to indicate halting speech or an unfinished sentence in
dialogue, written material.)

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(The Reporter's Disclosure was presented and
is attached.)

RAUL GOMEZ

having been previously sworn, testifies as follows:

EXAMINATION

BY MR. WINGO F. SMITH:

Q All right. So we're --

MR. TIMOTHY J. BUCKLEY: You need to speak up.
He's soft spoken.

Q (By Mr. Smith) Yes. So she's going to be
taking down everything that you and I say today. So a
couple of ground rules I want to make sure we cover,
such as, first, please speak up. I'll do the same. I'm
often soft spoken myself. The second is that we need to
make sure all your answers are audible. So if you nod
your head or shake your head, that's not going to get on
the record the way that we need to. So I need you to
say "yes" or "no;" okay?

A Mm-hm. Yes, sir.

Q And then, otherwise, you know, I'm going to
make -- allow you to finish your answers, and I'll going
to ask you to let me finish my questions, even though
it's going to be totally obvious to you what I'm asking
before I finish; is that all right?

A Okay.

Q Then we don't have crosstalk. It makes it a little bit easier for her. Occasionally, over the course of the day, you know, we will have -- someone might make an objection or something along those lines. Unless Mr. Buckley instructs you not to answer, I'm going to go ahead and ask you -- well, let them finish their objection and then answer.

A Yes.

MR. SMITH: That oftentimes is because I've asked a bad question or in a way that they think is objectionable. So before we ...

All right. One second. Is there anything else what we need to cover before we launch into this, guys?

MR. BUCKLEY: He's going to read and sign.

Q Yes. There you go. all right. Anything else? Good. Let's go ahead and start off.

Mr. Gomez, can you give me your full name, please?

A Raul Alexander Gomez.

Q And you were working for Rockdale County Sheriff's Office in 2024; is that right?

A Yes.

Q All right. When did you start there?

A March 25th.

airplanes?

A Yes, sir.

Q Okay. Sounds interesting. Why the change?

A Well, right now is -- I'm really busy with a restaurant right now, and this college is working with my schedule. So right now I'm, like, a manager at the restaurant. So that's, like, my second job. So I'm working there.

Q Were you working there when you were also at the sheriff's office?

A Yes.

Q Okay. So in 2024, when this happened with Mr. Smith, you were also working at the restaurant as well?

A Yes.

Q And the same restaurant you were working at before you went to the sheriff's office?

A Yes. Two jobs.

Q Yeah. That's a lot.

What's your schedule like at the restaurant?

A So I usually open up in the mornings. Then I have somebody close for me.

Q Okay. And was it that way as well when you were there in 2024?

A Like -- yes. Yeah. Mm-hm. Yes, sir.

Q Okay. You worked nights when you were at the

Q March 25th of 2024?

A 2023.

Q Of 2023? Okay.

A Mm-hm.

Q Before you went to the sheriff's office, where were you working?

A At a restaurant.

Q Which one?

A Tres Hermanos as a waiter.

Q Cause to you want to get into law enforcement?

A Tried to start up a new career.

Q And you currently no longer work at the sheriff's office; is that right?

A Yes, sir.

Q When did you end your employment there?

A October -- September 25th.

Q So this year?

A September 25th was my official last day.

Q What caused you to leave?

A Nothing. Right now I'm just attending school.

Q Okay. Where are you going to school?

A I don't know the name of it too well like that, but it's, like, to do with airplanes, build engines, and it just goes on there from.

Q You're learning how to repair and build

sheriff's office?

A Yes.

Q And you opened the restaurant in the morning after your shift?

A Yes.

Q When did you find time to sleep?

A I did have some sleep. I just would just go to the restaurant and lock the door and leave there until I see the person go in. And that's when I leave mostly.

Q Okay. Gotcha. All right. When you came onto the Rockdale County Sheriff's Office, what were the steps that you had to take before you could start working as a detention officer?

A Like, the first steps? I know we did the PAT test when I first got there. The PAT test is, like, a course you run around if you want to go on mandate. I passed that. We also -- what was that called? It's a test that they do where to see if you're lying or not.

Q Okay.

A And --

MR. BUCKLEY: Polygraph?

THE WITNESS: Yes, sir, polygraph.

Q (By Mr. Smith) So they had you hooked up, asked you some questions?

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1 A Yes, sir.

2 Q So did you the physical fitness tests. You
3 did the polygraph?

4 A I went to do my medical exams and then -- I
5 forgot. I went somewhere, all the way to Athens, to
6 take a math test and, like, a ... reading test --

7 Q Okay.

8 A -- ish.

9 Q So you had to read some stuff and answer some
10 questions about what you read?

11 A Yes, sir.

12 Q And then was there any training, though,
13 before you got on the floor about how to do your job as
14 a detention officer?

15 A Yes.

16 Q What was that like?

17 A It was a two-week training. So the first week
18 was days, and then the second week was nights, different
19 posts each day.

20 Q So you were actually put into the post to do
21 the work?

22 A Yes.

23 Q While you're being trained?

24 A Yes.

25 Q Okay.

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1 A It's, like, hands on.

2 Q Got it. Got it. And so before you got to do
3 the hands-on part, was there any -- did they go over the
4 policies of the jail with you?

5 A Yes. I forgot that part. We went over
6 policies. I tried to remember as much as possible.

7 Q Sure. And how long was that going over
8 policies part?

9 A That one, going over the policies, they gave
10 us two weeks. It was a lot of policies, but they gave
11 us two weeks.

12 Q Was that in a classroom setting or on your
13 own?

14 A It was on our own in a room on a computer. So
15 they would leave us there, and we would have to go over
16 the policies.

17 Q That sounds exciting.

18 How many folk were in your class with you?

19 A Two.

20 Q Two. Once you finished the two weeks of
21 hands-on training --

22 Well, actually, first of all, was that before
23 March 25th when you finished the two weeks of hands-on
24 training?

25 A Yes.

Page 11

1 Q Okay. So you did that, all the training, then
2 March 12, and you were able to start working on your own
3 on a shift?

4 A Oh, no, no, no. That's not what I mean. So
5 March 25th -- so you start March 25th, and that's what
6 you go through.

7 Q So the two weeks of hands-on training was
8 after that March 25th date?

9 A No. So the first -- when you get hired is on
10 March 25th, then the two weeks of the policies, and then
11 it's the two weeks hands on.

12 Q Okay.

13 A But that was, like, the old training regimen.
14 They have a new training regimen. This was when, like,
15 Sgt. Smith was with the training. He was doing the
16 training.

17 Q Got it.

18 A He's a lieutenant now, by the way.

19 Q Lt. Smith. Okay. So after you finished your
20 hands-on training, are you still given some kind of
21 close supervision while you're working at the sheriff's
22 office?

23 A Yes. They have people watching you, making
24 sure -- you know, like, if you end up messing up, they
25 try to help you out, like, have your back.

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1 Q So those are more experienced officers that
2 help you with that?

3 A Yes, sir.

4 Q Was it just, like, one officer or so, just
5 depending on who is on the shift?

6 A Actually, all officers watch each other's
7 back. So if you need help on somebody, you can ask
8 somebody, and they help you out.

9 Q Okay. That's good. So when you're coming
10 there, if you have questions, you can ask other officers
11 on the shift for help on what you're supposed to do?

12 A Yes.

13 Q All right. By July 2024, when Ezra was booked
14 into the jail there at the Rockdale County Sheriff's
15 Office, were you shadowing anyone, following them in
16 their duties at that point?

17 A No.

18 Q Okay. So you were just assigned to a shift
19 like everybody else at that point?

20 A Yes, sir.

21 Q Okay. So you already mentioned there was a
22 two-week period in which you were assigned to go through
23 the policies at the jail; right?

24 A Yes, sir.

25 Q Were you ever otherwise given a copy of those

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1 policies?

2 A Yes. They have actually ... they have
3 actually -- were trying to print them out for us too.

4 Q Okay.

5 A Yes, sir.

6 Q And then besides this reading through them,
7 did you talk with anyone about them during that two-week
8 period when you were reading through them?

9 A No. Most of the time I was just, you know,
10 trying to keep everything to myself, not trying to talk
11 to anybody about anything like that. Just try to
12 remember as many as possible policies that I can.

13 Q There wasn't some kind of quiz or in-class
14 instruction about that?

15 A No. That was -- that's what the hands-on
16 thing was for, to see if you read the policies on what
17 to do what and not to do.

18 Q So it was a real-life test?

19 A Mm-hm.

20 MR. BUCKLEY: You have to say "yes" or "no"
21 for the court reporter.

22 A Yes.

23 MR. BUCKLEY: Thank you.

24 Q (By Mr. Smith) So as a matter of course,
25 you'd agree that when you were a detention officer, you

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1 give the same objection -- Wait for him to finish. Then
2 you can answer again.

3 Q So if you deviate from the policies, it can
4 increase the risk to officer safety as well?

5 MR. BUCKLEY: Objection.

6 You may answer.

7 MR. WAYMIRE: Join.

8 A Oh, yes.

9 Q (By Mr. Smith) All right. I wanted to kind
10 of go a little further down the road, if we can. So
11 would you agree as well that as a detention officer, you
12 had a duty so ensure the safety and welfare of inmates
13 in your custody?

14 MR. WAYMIRE: Object.

15 MR. BUCKLEY: Join.

16 You may answer.

17 A Yes.

18 Q (By Mr. Smith) And part of that duty would
19 protect inmates from harming themselves?

20 MR. BUCKLEY: Same objection.

21 MR. WAYMIRE: Join.

22 MR. SMITH: You may answer.

23 A Yes.

24 Q (By Mr. Smith) And Rockdale County Sheriff's
25 Office, they have a particular policy that instructs

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1 had a duty to follow those policies?

2 THE WITNESS: Say that again.

3 Q (By Mr. Smith) When you were a detention
4 officer, you had a duty to follow those policies?

5 A Yes.

6 Q All right. And beyond the duty, you would
7 agree it was important for detention officers to follow
8 those policies and procedures?

9 A Yes.

10 Q And it's important because to follow policies
11 to protect officers and inmates alike?

12 THE WITNESS: Like, repeat that one again.

13 MR. SMITH: Yeah.

14 Q (By Mr. Smith) Would you agree its important
15 to follow the sheriff's policies to protect both inmates
16 and officers?

17 A Yes.

18 Q And if you deviate from those policies, it can
19 increase the risk to inmates, can't it?

20 MR. WAYMIRE: Objection.

21 MR. BUCKLEY: Objection to form.

22 You may answer.

23 MR. SMITH: You can answer.

24 A Yes.

25 MR. SMITH: Okay. And if you were going to

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1 officers on suicide prevention and responding to
2 suicides?

3 A Yes.

4 Q Would you agree then that suicide prevention
5 is a critical responsibility of a detention officer at
6 the Rockdale County Sheriff's Office?

7 A Yes.

8 MR. BUCKLEY: Objection.

9 You may answer.

10 MR. WAYMIRE: Join.

11 Q (By Mr. Smith) So as such detention officers
12 then are required to take inmates statements about
13 self-harm seriously; is that right?

14 MR. BUCKLEY: Object to the form.

15 You may answer.

16 MR. WAYMIRE: Join.

17 A Yes.

18 Q (By Mr. Smith) When an inmate threatens
19 self-harm, that's a medical emergency; is that correct?

20 MR. BUCKLEY: Object to form.

21 MR. WAYMIRE: Object to form.

22 MR. SMITH: Go ahead.

23 MR. BUCKLEY: It's up to you. I'm not telling
24 you to just say "yes."

25 A I don't know.

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1 Q (By Mr. Smith) You don't know?

2 A No.

3 Q If it were considered a medical emergency
4 under the policy, that required DOs to take immediate
5 action?

6 MR. BUCKLEY: Object to the form of that as
7 well.

8 MR. WAYMIRE: Join.

9 Q (By Mr. Smith) I want to ask you some sort of
10 background questions to make sure I understand. So when
11 you come in for the night shift, what time did you
12 normally have to get there?

13 A We would have to be there at least 20 minutes
14 early. So you would have to be probably inside roll
15 call around 5:38.

16 Q All right. And you have roll call. What's
17 that like?

18 A It was just briefing on what happened about
19 the shifts, like, if they had any use of force, if they
20 took anybody to the ER, 52 watches. Yeah.

21 Q Okay. And so just for clarity, when someone's
22 going back to read this, what is the 52 watch?

23 A Basically, when an inmate says that he wants
24 to kill himself. So that's when you take precautions,
25 and you tell a supervisor about it. And once the

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1 suicide in a holding cell at the Rockdale County
2 Sheriff's Office; is that your understanding?

3 A Yes.

4 Q Okay. In the preshift briefing leading up to
5 that shift, did you get any information about the
6 booking area prior to being assigned there?

7 A Yes.

8 Q What did they tell you what was going on?

9 A They did say we had a lot of people in the
10 Holding Cell 7, and there was a lot of ATW folders. ATW
11 means people that are being released out of the jail.

12 Q Okay. And that's helpful for me. So thank
13 you.

14 So ATW is -- do you know what it stands for,
15 by any chance?

16 A No, sir, I did not.

17 Q Someone else told me it stood for "all the
18 way." Does that ring a bell with you at all?

19 A I mean, I've thought of something like that,
20 but no, sir.

21 Q I'm wanting to understand what an ATW is
22 exactly. You said it's people who are about to be
23 released?

24 A Yes.

25 Q What about people who are being held for

Page 18

1 supervisor confirms it, then you have to take the -- how
2 do they say that word? The --

3 Q Procedure?

4 A -- procedure -- yeah. Uh-huh -- and he would
5 have to get dressed out of his jumpsuit and into a
6 suicide shirt.

7 Q 52 is another way for people to say suicide in
8 a jail setting?

9 A Yes.

10 Q So at the briefing, that's when you get your
11 assignment for the night too; right?

12 A Yes.

13 Q All right. So you get up date for what
14 happened on the shift before you, and you get your
15 assignment for the night?

16 A Yes.

17 Q Is there anything else that you get from the
18 briefing, the preshift-briefing meeting?

19 A No, sir.

20 Q Okay. I'm curious. My understanding is that
21 that night, the night that -- the shift we're talking
22 about --

23 MR. SMITH: Well, let me back up.

24 Q (By Mr. Smith) You understand that this case
25 is about a time in July 2024 when Ezra Smith attempted

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1 another county? Are these ATW as well?

2 A No.

3 Q Okay.

4 A Those are different. They are -- so when they
5 first come, they get booked in because they're being
6 held for another agency. So we contact the other agency
7 and say, "Hey, this person is here. When are you guys
8 going to be picking him up? Because he has charges for
9 your county," and that's it.

10 Q Okay. Do they hold -- well, we've heard
11 something like "blue folder." Did that -- do you
12 remember a special color folder for those folks?

13 A No, sir. Everybody else has blue folders.

14 Q Okay. So there's no way to determine whether
15 or not a folder is an ATW or a hold for another county,
16 for example?

17 A There are sections on their folders. So they
18 put a section with ATW and people that are being booked
19 up. Everything is all separate from everything.

20 Q So just to make sure that I understand,
21 physically housed in different places? Is that why?

22 A Well, the folder is kept in a different place
23 physically.

24 Q Is that how you know you go over here to find
25 the ATW folders?

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1 A Yes. So, like, if the ATW folder was on the
2 lieutenant's desk, I would grab them, and he would tell
3 me to fingerprint them, make sure they get out, and
4 after that he would go through it and make sure
5 everything is right, done correctly. And they're
6 processed out.

7 Q Okay.

8 A Same thing with the people with those
9 different agencies. There's a different desk for that.
10 We put them on a different -- it's, like, a folder
11 bracket, and it has, like, a logo hold for different
12 agencies. ATW.

13 Q Okay. So when you're coming in from the
14 debrief --

15 Did the preshift briefing give you any
16 priorities that you had to work on when you first got
17 into the booking area that night?

18 A Yeah, from my lieutenant, Lt. Daniels. He
19 said work on the ATWs first.

20 Q So Lt. Daniels gave you a direct order in
21 terms of what you were supposed to concentrate on?

22 A Yes, sir.

23 Q That night you were the booking officer; is
24 that right?

25 A Yes, sir.

Page 22

1 Q Okay. Were there any other booking officers
2 that night?

3 A No. It was just me, sir.

4 Q Okay. Do you know how many people you had to
5 process that night?

6 A No, sir. It was a lot, though.

7 Q Yeah. Do they tell you what happened the
8 shift before that people got so backed up?

9 A No; they didn't tell us anything of -- like,
10 what happened or anything like that. This was -- just
11 told us was a lot of holding cell, and my mindset, I'm
12 going to get this done.

13 Q As I understand it, there's a part of the
14 booking process that happens before you get placed into
15 a booking cell.

16 A Yes, sir.

17 Q What part is that?

18 A The intake process. That's where I intake
19 jail-card information: last name, first name, date of
20 birth, time he was in, time he was brought in, charges.
21 Then you would have to take him to Tech 84, which is a
22 machine, like -- I think it's, like, a 3D machine.

23 Q Like, it scans the person?

24 A Yes, yes, yes. That's what it's called. And
25 it makes sure he has nothing on him. And after that you

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1 would have to take him into a room. He would have to
2 dress out. Anything that isn't white, he cannot keep.
3 So he can't have, like, a shirt that has like a logo on
4 it. If it's a shirt all white, he can keep that.

5 Q So the person gets dressed out. And after
6 they're dressed out, what happens?

7 A They place them in the holding cell, and
8 that's when you processed them in.

9 Q What steps remain after you put them in the
10 holding cell?

11 A You have the mug shots, fingerprint, iris
12 scan. They have to sign their papers saying that this
13 is the property that was taken away from them and
14 properly bagged into the evidence room. And they get
15 their classification wristband on, and that's really
16 about it. After that, after their folder is cleared by
17 lieutenant, corporal, sergeant, then they're good to go
18 to population.

19 Q And lieutenant on shift that night was Lt.
20 Daniel?

21 A Yes, sir.

22 Q Do you remember how many of the folks that you
23 were dealing with were ATWs?

24 A I don't remember, but it was a lot, though.

25 Q And when you were processing a file like that,

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1 how long does take to do the part after intake? Like,
2 once they've been put in the booking cell, how long does
3 it take to finished the rest of it?

4 A It all depends because you have other people
5 that are on the bench. They need to be taken out of the
6 intake bench. So we can't really get too backed up.

7 Q At what point do the -- at what point does the
8 inmate get screened by medical person?

9 A Whenever she requires them.

10 Q So she can -- that is, the nurse is the "she"
11 you're talking about?

12 A Yes.

13 Q So the nurse can come in and say, "Hey, I need
14 to screen this person"?

15 A We usually -- we ask her, "Are you ready to
16 start screening?" Or she tells us when she's ready.

17 Q Can she screen somebody at any point in the
18 process after the person has gone through intake and in
19 the cell?

20 A No. He has to be booked in. His information
21 has to be in the system.

22 Q Okay. When you're facing a backlog like that,
23 is there an order of priority between inmates that you
24 use to determine who you should process first?

25 A Well, my Lt. Daniel said -- I got to listen.

Page 25

1 He's above me in command. I can't just go do something
2 else. So I have to do what he tells me directly.

3 Q Sure. Did he tell anybody else to do the ATWs
4 that night?

5 MR. BUCKLEY: Objection. Form.

6 A I don't remember, sir.

7 Q (By Mr. Smith) Okay. Am I correct in
8 assuming -- am I correct that inmates are not supposed
9 to be held in booking longer than eight hours?

10 MR. BUCKLEY: Ask that again.

11 MR. SMITH: Sure.

12 Q (By Mr. Smith) Am I correct that inmates are
13 not supposed to be held longer than eight hours?

14 A I do not know.

15 Q Was there anyone else helping you that night
16 in booking?

17 A Yes, sir.

18 Q Who was else was helping you that evening?

19 A Dep. Tracey, Dep. Jackson.

20 Q Just those two?

21 A Yes.

22 No, no. Tech -- we call them tech, but Ms.
23 Lewis was there, Civilian Lewis.

24 Q What do the techs do?

25 A They're the people who just, you know, book

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1 Q So you've seen these before?

2 A Yes.

3 Q What I was wanting to understand was that when
4 Ms. Lewis puts in someone's card information, is that
5 when the person shows up on the list report?

6 A Yes. So booking will have one like this. So
7 when you go into roll call, all of them will be laid
8 out. So you have -- wherever you work at, all of these
9 are laid out.

10 Q Yeah?

11 A I have 6A, booking, medical towers movement.
12 So you have your own little sheet of who you're supposed
13 to keep track of and what who you're supposed to be
14 responsible over. I got a booking one, and it was just
15 names like this.

16 Q Okay. Now, this is from -- as I understand
17 it, this list by cell of the folks who were in the
18 booking area 78 on July 8th, 2024. And this first sheet
19 is based on -- at 6:00 p.m.

20 Is that how you read that?

21 A Yes, sir.

22 Q Okay. Now, is this updated every hour; is
23 that how that works normally?

24 A So usually there's a thing where we keep
25 everything on track. It's like Odyssey. So we have a

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1 them in book the -- the inmates, the jail cards.

2 Q Okay. So when the jail card comes to intake,
3 it's Ms. Lewis's job to input them into the computer?

4 A Yes, sir.

5 MR. SMITH: Let me ask you a question about
6 that because I'm trying to understand this.

7 (Plaintiff's Exhibit No. 1 was marked for
8 identification.)

9 MR. SMITH: We'll call this 1. I'm going to
10 show it to your attorney first.

11 I only brought a couple of copies because we
12 have seen these before. If you want me to email these
13 to you, I can do that but this is just the inmates list
14 report. This was part of the discovery.

15 MR. BUCKLEY: Are you going to give the court
16 reporter a set to attach?

17 MR. SMITH: Yes, and it's going to be the one
18 you're holding that she'll attach.

19 Q (By Mr. Smith) All right. You see what I've
20 labeled Exhibit 1?

21 A All right.

22 Q Yeah. I'm sorry that's a bad one. Forgive
23 me, hopefully.

24 Do you know what this document is?

25 A It's an inmate list report.

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1 thing basically if you don't type it down or write it
2 down with the time, you basically ain't do it.

3 Q Okay.

4 A So there's post logs from wherever you are at,
5 wherever your post is at. You write down what you do.
6 If you was to go on your security check, you'd write
7 down "security check" at this time and you'd say
8 everything seems fine.

9 Q So you would use this report in order to do
10 your observation rounds?

11 A Nah; it's different paper. Yeah.

12 Q Okay. Got it. So what do you use this report
13 for in your -- while you're posted at booking?

14 A Attendance to make sure who is in what cell.

15 Q okay.

16 A And -- you know. Yes, sir.

17 Q Okay. So it's, like, if you're doing head
18 counts, do you use it?

19 A Yes, head count, for our headcount.

20 Q Got it. How long does it take Ms. Lewis then?
21 Did Ms. Lewis do anything else other than data-input the
22 cards into the system?

23 A That's all she does. She's not allowed to be
24 nowhere no inmates are or talk to inmates.

25 Q Got it. And so eventually if we see someone's

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1 name, we will know that Ms. Lewis inputted that person's
2 information. Is that how you would understand that?

3 THE WITNESS: Repeat that again.

4 MR. SMITH: Yeah.

5 Q (By Mr. Smith) So if we go through here and
6 we look at the 6:00 o'clock -- for example, let's look
7 at Cell 7. As I understand it, that's, like, six down
8 more or less.

9 Do you see where Cell 7 is on the paper on the
10 front first sheet?

11 THE WITNESS: This one?

12 Q (By Mr. Smith) Well, read out the inmates'
13 name for me.

14 A Wilson van Pete.

15 Q Okay. So that's Cell 7 in the holding area;
16 is that correct?

17 A Yes, and booking.

18 Q Okay. So my understanding is that when you
19 came on that night, Ezra was already in the cell; is
20 that right?

21 A Yes, sir.

22 Q But he doesn't show up on this list report
23 from 6:00 p.m. That's when your shift started; is that
24 correct?

25 A Yes.

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1 normally the guys in the holding cell wouldn't see
2 medical until you're done being booked in; is that
3 right?

4 A Yes.

5 Q If there was a 52, the nurse could see that
6 person before they were booked in; is that your
7 understanding?

8 A I don't know about that.

9 Q You don't know?

10 A Don't know about that.

11 Q All right. At the end of night, what do you
12 do with your reports that you've written on?

13 A So usually we would turn them in. But this
14 was before this incident happened. So when this
15 incident happened, we just had to discard them in the
16 shredder.

17 Q I'm going to have to ask you to help me
18 understand what it is you're telling me. So was
19 there -- on this particular night, you said you shredded
20 them? Is that what you're telling me?

21 A Well, I just threw my papers away. I usually
22 don't shred them. So I usually throw them away.

23 Q Okay.

24 A So with these papers, we're not supposed to
25 even have them out of the building. We could just throw

Page 30

1 Q Okay. So if I'm understanding what you're
2 telling me, it's just that Ms. Lewis had not yet typed
3 in his card into the system by the point you got on
4 shift; is that what you're telling me?

5 A Yes.

6 Q So when you did your head count, you didn't
7 have him listed?

8 You did a head count when you first come in;
9 is that right?

10 A No. So usually -- when I usually do head
11 count, yes. But usually when they're not on my list, I
12 write them down either way. So I go inside the cell:
13 What is your last name? First name? Okay. Cool.
14 First name last, name. Okay. Cool.

15 Q Mm-hm.

16 A And then I run that back and include them in
17 my head count.

18 Q Okay. So do you remember writing down Ezra's
19 name that night?

20 A I don't remember at all.

21 Q Do you remember talking to Ezra when you came
22 onto shift at all night that night?

23 A Don't remember.

24 Q Okay. You know, earlier we talked about -- I
25 just wanted to go back so I don't forget this. You said

Page 32

1 them away. Yes, sir.

2 Q Got it.

3 A But the only thing they do collect is the post
4 logs.

5 Q Okay. So the logs. Who enters the post logs?

6 A Whichever supervisor comes and pick them up.

7 Q And those are handwritten by you, the post
8 logs?

9 A Yes, sir.

10 Q Okay. What are you supposed to be logging on
11 the post log?

12 A So it all depends where you at. When I was in
13 booking, I usually -- I know don't -- usually we don't
14 do anything about post logs. Everybody is all monitored
15 there. ATWs are always kept in check, you know. Check
16 who's the ATW, this and that.

17 Q So you actually -- as a booking officer, you
18 didn't have the habit of actually entering any post logs
19 yourself?

20 A No, sir.

21 Q Okay. So who would do it for the booking
22 area? Who would enter those logs?

23 A You don't do no logs for the booking. The
24 only logs you have to do would be for 6A, 6B, or the
25 towers or central to keep count where -- like, inmate

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movements, tracking.

Q Did you have a tower for booking? Was there a tower that was assigned to booking?

A No.

Q Just want to go back one quick second. When you do a head count, do you radio in the count to the lieutenant or to someone else?

A So usually booking -- so there's -- the booking deputies take head count. So people call in from, like, what you could call 6A, 6B. They call in head count, and we usually take it down on a piece of paper called formal head count paper. After that we turned it in to the lieutenant. Lieutenant looks over it, confirms it. Head count is clear.

Q Would the inmate reports suggest -- I'm having trouble sort of kind of squaring it here -- is that the official head count is not counting several people who are physically in the jail at that time? Was that your experience?

So, for instance, you told me Ezra was already in the cell when you came on the shift.

A Yes, sir.

Q Okay. The list report doesn't have Ezra's name -- is that right? --

A Yes.

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very cool. I have no problem with her. That's really about it.

Q What about Jackson? Had you worked with her before?

A Yes. She is actually a very great person.

Q That's a slightly different answer than you gave for Tracey. What makes Jackson so great?

A Well, Ms. Jackson was the one who -- when I've had trouble, she always tried to help me out.

Q Okay.

A Yes.

Q You're describing like before, everyone watches everyone else's back?

A Yes.

Q Can you give an example of when she was helping you out?

A Like, fingerprinting information. I didn't know how ... how to fingerprint them, like, correctly. sometimes the machine -- when you -- like, I mean the minute would take the print, but, like, sometimes it would just deny the print. So it would be a certain way you would have to, like, move to get their hands, like, adjusted and then print them, and then it will go through.

Q So she was -- she just had more familiarity

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Q -- for 6:00 o'clock?

What do you do when there's a discrepancy between the number of people that you physically counted and the list? Like, how is that resolved?

A Like I said, I usually just write them down on the piece of paper first, last name and first name. And --

Q Okay.

A -- I show my lieutenant, "Here. These are people we actually got that are in the system and that these are the people that we don't have in the system, but they are in the holding cell."

Q He gets your handwritten one so he can see who those folks are?

A Yes, sir.

Q All right. Got it. How often had you worked with Dep. Tracey at that point?

A It's honestly rare for me to get paired up with her.

Q Okay. You had worked with her before, though?

A A couple of times. Not as many but a couple of times.

Q And how would you describe her as a coworker to someone else?

A To me she was ... she was respectful. She was

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with how to use the fingerprint machine to get it to work the first time?

A Yes.

Q Okay. Was she helping but with that the night that we're talking about in July of 2024?

A No.

Q Okay. What was -- what were Jackson and Tracey doing then in booking that night?

A Ms. Tracey, I was not really keeping an eye out on. Ms. Jackson, I know she was at the podium. I was done at the fingerprint machine, fingerprinting ATWs that was ready to leave.

Q That sounds like a pretty specific period of time. So let's back up a little bit.

Were they doing the same general duties that you were doing that night?

MR. BUCKLEY: Object to form.

You may answer.

A I don't remember, honestly. I was just going to do what I was just supposed to do.

Q (By Mr. Smith) Okay. Did you see Tracey or Jackson outside of work?

A No, sir.

Q All right. But both Jackson and Tracey had more experience than you did; is that right?

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1 A Yes.

2 Q So if you had a question on the shift, they
3 would be people that you could reach out to to get an
4 answer?

5 A Yes.

6 Q Was there anything besides working -- going
7 through and working the folders that you remember doing
8 that night as part of your responsibilities as a booking
9 officer?

10 THE WITNESS: Could you repeat that one time?

11 MR. SMITH: Yeah.

12 Q (By Mr. Smith) Besides working the folders
13 processing ATWs, for example, was there other things
14 that you were doing as part of your responsibilities of
15 booking officer that evening?

16 A Yes. Actually, we were working on rotations
17 too at the same time of. Rotations are when you have
18 people that are being housed up in booking for detox
19 reasons, medical reasons, or mental health reasons.

20 Q What do you do on a rotation?

21 A They're only allowed to -- there's a certain
22 section. The front area of booking where the Holding
23 Cell 1 through 14, day shift does rotation for them
24 only.

25 Q Okay.

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1 Q A drain?

2 A Yes, a drain. Exactly.

3 Q There's no bed; is that right?

4 A No bed. Just the suicide gown and suicide
5 blanket.

6 Q Okay. There's no toilet either in there?

7 A No, just the drain.

8 Q All right. And then it sounds like it goes
9 without saying, there would be no telephone in there
10 either?

11 A There would be nothing at all except for the
12 camera on the corner.

13 Q Each of those cells have had an interior
14 camera as well?

15 A Yeah, sir.

16 Q Where were those monitored from?

17 A You can -- well, on one of them, you can see
18 from medical, and the other one you can see from
19 booking.

20 Q So if someone were housed in there, both the
21 nurse and --

22 A -- the medical deputy. So there's medical
23 booth, computer. Like, left side you have a screen
24 where you can see on one of the cells.

25 Q So is there a medical deputy on the night

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1 A 7 is holding cells. So they constantly coming
2 in and out, signing papers, and being processed in. So
3 you got transports. Transports side, you have four
4 cells: some detox, mental health observation, or
5 medical observation. Now, those people -- those in the
6 transport side is night shift. They have to receive
7 rotation at least an hour minimum, which is -- like,
8 they get let out to use the phone kiosk or visitation.

9 Q Got it. Okay. So rotation then is for them
10 to have their personal time outside of the cell, even
11 though they're in a special-cell situation?

12 A Yes.

13 Q Were there any cells open that night that
14 could be used for housing someone who is suicidal?

15 A I don't remember that.

16 Q All right. There were certain cells that was
17 designated for 52s; is that right?

18 A Yes.

19 Q And can you describe what those cells are
20 like?

21 A It has nothing.

22 Q Okay.

23 A It's, like, nothing at all. Just, like, a
24 little thing in the middle where, you know, they can do
25 their business.

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1 shift?

2 A Yes.

3 Q Okay. Do you know who it was that night?

4 A No. I don't remember.

5 Q Okay. Was the medical deputy physically
6 normally in booking?

7 A No.

8 Q Okay. Where were they normally posted at?

9 A Medical.

10 Q In the separate part of the jail reserved for
11 medical folks?

12 A So medical is inside of the jail. I don't
13 know. How would I explain it? It's inside of the jail,
14 and it's close by booking.

15 Q All right. What about -- so the nurse that
16 night. Who was the nurse that night?

17 THE WITNESS: In booking?

18 MR. SMITH: Yes.

19 A Nurse Sanchez.

20 Q (By Mr. Smith) Is Nurse Sanchez's office in
21 booking or medical?

22 A Booking.

23 Q All right.

24 A It's literally right by the intake area, you
25 know when they first come in, right by it. So the

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1 intake area, you take a, like, little right. Yeah. You
2 take, like, a little right. The nurse is right there.

3 Q Had you worked with Nurse Sanchez before?

4 A Yes.

5 Q So my understanding is that detention officers
6 do pill call with the nurses; is that right?

7 A Yes.

8 Q Is there anything else that's sort of a
9 regular part of your job as a booking officer that you
10 do with the nurse in booking?

11 A No, just the pill call and then letting them
12 out so they can get screened by the nurse.

13 Q When they do that screening, where do they do
14 the screening at?

15 A Inside the nurse's office.

16 Q Is there someone who goes and stands at the
17 door of the office while they're being screened?

18 A No.

19 Q So once you've taken someone there to be
20 screened, you go back and do whatever it was you were
21 doing in the booking area?

22 A Yes.

23 Q Since the nurses office is right there next to
24 the intake part --

25 Well, when you're at the nurses office, are

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1 Q Did anyone come to be screened by Nurse
2 Sanchez that night?

3 A I don't remember.

4 Q Does she get there when you get there on
5 shift?

6 A No. Actually, the nurses come an hour later.

7 Q Okay. If you hit the floor at 6:00, then
8 she's there at 7:00?

9 A Yes. You have other nurses from day shift,
10 though. I think their schedule is different from our
11 schedule because the nurses be leaving around, like,
12 7:00, and the new nurses pop up around 7:30.

13 Q Okay.

14 A It's, like, they have their own shift, I
15 guess.

16 Q They don't go to your preshift briefing;
17 right?

18 A Yeah. Oh, yeah. The day shift does come to
19 our preshift briefing and tell us who's in the ER, who's
20 on 52, if they observed any uses of force that's. What
21 I mean by being briefed. So the nurses are there to
22 brief us.

23 Q She gives a medical update, essentially?

24 A Yes.

25 Q It's my understanding that around 8:00 o'clock

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1 you able to hear things in other parts of booking?

2 THE WITNESS: Explain that again.

3 MR. SMITH: Yeah.

4 Q (By Mr. Smith) I'm trying to figure out,
5 like, audibly how close the nurses office is to the
6 cells and to the platform.

7 A I think she's, like -- no. She is, like, six
8 cells away from the holding cells.

9 Q Okay. For those of us who haven't spent a lot
10 of time in the holding cells, how would you estimate
11 that distance? Like, how long is that?

12 A Ain't good with distance. I'm not going to
13 lie to you.

14 Q That makes two of us then.

15 The booking area, though, is otherwise kind of
16 open; right?

17 A Yes.

18 Q Okay.

19 A Spacious.

20 Q So is it relatively easy to hear someone from
21 one side of the booking to the other?

22 A If you start yelling, yes.

23 Q All right. You weren't the person who did
24 pill call that night, were you?

25 A No, sir.

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1 or so, Ezra Smith's mom called the jail and talked with
2 Dep. Tracey.

3 Were you there for that call?

4 A No, sir.

5 Q My understanding was in at least one of the
6 statements that we saw, the call lasted something like
7 40 minutes and was on speaker phone.

8 Does that -- you don't remember any part of
9 that call, though?

10 A No, sir. I don't remember even the call by
11 his mom.

12 Q Okay. Did Dep. Tracey talk with you at all
13 about Ezra's mom calling?

14 A No, sir.

15 Q Okay. Did you hear Tracey describe Ezra as
16 "what happens when your parents are brother and sister"?

17 A That, I don't know. I don't remember.

18 Q Okay. And at some other point in the shift, I
19 guess, before midnight, I know that inmates in Holding
20 Cell 7 were mashing the intercom button.

21 Can you explain, first of all, like, how does
22 the intercom -- how does that work? Where does it go?

23 THE WITNESS: So the -- like, from what?
24 Holding Cell 7? Where does it go?

25 MR. SMITH: Yeah.

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1 A To the booth where Tracey was at. Yeah. To
2 the booth where the cameras was at. There's a booth and
3 there's an intercom right there. So intercom -- usually
4 it's for -- intercom's usually for emergencies. So you
5 will answer it, and you would say, "What is your
6 emergency?"

7 Q Okay.

8 A And, you know, I guess, whatever response the
9 inmate gives out.

10 Q Am I right that, well, in order to answer it,
11 you have to press a button; right?

12 A Yes.

13 Q Okay. Before you press that button, how you
14 are you alerted to the fact that someone's using the
15 intercom?

16 A It beeps really loud.

17 Q Do you remember the intercom going off that
18 night?

19 A I don't remember.

20 Q Okay. Did you happen to be there when Tracey
21 was talking to the inmates in Holding Cell 7 through the
22 intercom?

23 A I don't remember that either.

24 Q All right. When do you do counts on night
25 shift? You do one at 6:00 when you come onto a shift?

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1 have in front of you real quick -- let's see. There we
2 go -- they're not paginated, so give me one second.
3 Let's go six pages in where it says 12:00 a.m.,
4 7/9/2024.

5 MR. BUCKLEY: On the sixth page?

6 MR. SMITH: Yeah; I think that was the sixth
7 page.

8 MR. BUCKLEY: It says at the top as of
9 7/9/2024, 12:00 a.m.?

10 MR. SMITH: That's correct. You're in the
11 right spot.

12 Q (By Mr. Smith) Okay. So at this point in the
13 count, we see -- if you go to Cell 7 for me --

14 A Yes.

15 Q -- we have more people listed in the cell than
16 we did at 6:00 o'clock.

17 A Yes.

18 Q All right. But Ezra Smith still isn't listed
19 there; is that right?

20 A Yes.

21 Q So someone's doing count that night at 6:00
22 and at 10:30, they would have to have written Ezra's
23 name on the count sheet; right?

24 A Yes.

25 Q Okay. And then told Lt. Daniels, "Has this

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1 A Yes.

2 Q When's your next one after that?

3 A 10:00. No 10:30. 10:30.

4 Q You do one at 6:00, one at 10:30 --

5 A And one at end of shift.

6 Q When is end of shift?

7 A Well, we usually call it in by 5:00.

8 Q But end of shift is really exactly at 6:00
9 o'clock, but you've got to get it done before you pack
10 up.

11 A Yes.

12 Q So were you the person that did the 10:30
13 count that night?

14 A Don't remember that.

15 Q When you do count, do you -- well, take me
16 through it, how you do the count. I understand that you
17 physically count everyone who's in the thing. But,
18 like, where do you do it from?

19 A I usually like to start from the front, the
20 first holding cell: "What's your first name, last
21 name?" They tell me. I look at it to make sure they're
22 in the right cell, make sure it's the right first and
23 last name. Check it off, go on to the next one. Same
24 thing, go on to the next one. Same thing.

25 Q Okay. So if we look at the document that you

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1 guy still hasn't even been put in the system"?

2 A And booked in, yeah.

3 Q All right. You don't remember, though, if you
4 did the 10:00 o'clock count; is that correct?

5 A Yeah; I don't remember if I did or not.

6 Q All right. At any point in time, did anyone
7 tell you that you needed to get him booked in because he
8 still wasn't showing up in the system?

9 A No. I was just told to the fill ATWs, and we
10 were trying to get them out. I know there was a lot of
11 ATWs. So we had to focus on them first for the people
12 in the holding cell.

13 Q Well, eventually Ezra was the only one left in
14 the cell; is that correct?

15 A I don't remember.

16 Q Well, when you responded to the 52 emergency,
17 were there any other inmates in the cell at the time?

18 A I don't remember that either.

19 MR. SMITH: Okay.

20 MR. BUCKLEY: When you say "the cell," you
21 mean the cell that Ezra Smith was in?

22 MR. SMITH: That's the cell. I'm going show
23 him a copy of this statement. We'll call this Exhibit
24 2.

25 (Plaintiff's Exhibit No. 2 was marked for

1 identification.)

2 Q (By Mr. Smith) All right. Take a look at
3 that for me real quick. Read over it. Let me know when
4 you're done.

5 A Okay.

6 Q Okay. Does this refresh your memory a little
7 bit about what was happening at this time that Ezra
8 attempted suicide?

9 A Not really. I'm not even going to lie.

10 Q That's fine. Had you -- prior to this night
11 or early morning, as it were, had you ever witnessed
12 another suicide or suicide attempt at the jail?

13 A No. I was just there to back one up.

14 Q Okay. How early on was that in your time
15 there?

16 A I don't know. I don't remember.

17 Q Okay. Can you tell me a little bit about the
18 exchange between Ezra and Tracey that night? Like, what
19 was Ezra saying?

20 MR. WAYMIRE: Object to form.

21 MR. BUCKLEY: Join.

22 You may answer.

23 A Well, I do remember him saying he was wanting
24 to kill himself because he was -- he said he was
25 suicidal.

1 Q (By Mr. Smith) All right.

2 A Ms. Tracey, as I -- him and Miss Tracey were
3 going at it. They were both yelling at each other.

4 Q And at one point did you -- or did you go up
5 to the cell at some point?

6 A I don't remember.

7 Q Okay. So they were yelling back and forth.
8 If I understand you correctly, they were yelling back
9 and forth; is that correct?

10 A Yes.

11 Q And you heard Ezra say that he was suicidal?

12 A Yes.

13 Q All right. What did you hear Tracey say after
14 he said he was suicidal?

15 A I don't remember too much clearly.

16 Q Okay.

17 A But I do remember her saying that -- "Well, be
18 a man about it. Do it, then."

19 Q Okay. After you heard that --

20 Well, first of all, when you heard that, do
21 you remember where you were?

22 A At the fingerprint machine talking to the --
23 well, the ATW was talking to me. So that was the only
24 reason I wasn't really paying attention.

25 Q Okay. Were you at the fingerprint machine the

1 whole time this exchange was going on?

2 A No.

3 Q Okay. So kind of take me through it. This is
4 happening. Where are you at while it's happening?

5 THE WITNESS: While it's happening?

6 MR. SMITH: Yeah.

7 A Oh, yes. Yes. I was at the fingerprint
8 machine most of the time.

9 Q (By Mr. Smith) After you heard Ezra say that
10 he was suicidal and Tracey say, "Be a man about it and
11 do it," what did you do next?

12 A Well, I was still fingerprinting the ATW guy,
13 and the guy was still talking to me. The guy didn't
14 know no English, but he was talking to me in Spanish and
15 I was talking back to him in Spanish. He said, "What's
16 going on?" I said, "Don't worry about it right now.
17 I'm just trying to -- we're trying to focus on trying to
18 get you out, and we're going to fingerprint you."

19 Q And this is with Daniel? Is that the guy's
20 name?

21 A The -- the ATW, the guy I was fingerprinting,
22 no. I don't know the guy's name.

23 Q Okay. After you finished fingerprinting him,
24 what did you do next?

25 A I didn't even get to finish fingerprinting him

1 actually.

2 Q Okay.

3 A It was mid -- like, when I was finishing off
4 his fingerprinting -- we was doing it off the left one
5 when he -- that's when the whole situation happened, and
6 that's when I put him in the Holding Cell 8.

7 Q That's the holding cell next to the one Ezra
8 was in?

9 A Yes.

10 Q Did you hear -- well, how did you -- what did
11 you hear that led you to take him into the Holding Cell
12 8?

13 A Well, I remember turning around for a split
14 second, seeing Ms. Tracey as I open the door. And she
15 yelled out, I believe, "medical emergency" or something
16 like that. I turned around. I turned around, and I
17 grabbed the guy because when a situation like that
18 happens, everybody has to be secured. It don't matter
19 if you're an inmate or ATW. Everybody has to be
20 secured. So everybody was secured. So the two ATWs
21 were placed in the Holding Cell 8, and that's when I
22 went to go help out Ms. Tracey and Ms. Jackson.

23 Q All right. And then how did you help them
24 out?

25 A Just being at the door.

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Q At the door of the cell or some other door?

A Just at the door of the cell.

Q Okay. After Ezra was taken out, you finished up the shift; right?

A Yes.

Q Okay. Were you interviewed during the shift at all about what happened?

A I don't remember.

Q Okay. Did you talk to Tracey or to Jackson at the end of shift about what happened?

A Yes.

Q What did you guys discuss?

A I don't remember what we said.

Q Okay. Looking at Exhibit 2, this -- you agree with me, this is an email that you sent to Kevin Tatum?

A Talking about Lt. Tatum? Oh, yes.

Q As I understand it, the date that you sent that was on Saturday, July 13th; is that right? That's what you see at the top there?

A Yes.

MR. SMITH: Okay.

THE WITNESS: 7th of July; right?

MR. SMITH: Yes.

A Okay. Yes.

Q (By Mr. Smith) Did Lt. Tatum ask you to send

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then that's when you type your incident report. So what I had to do was write that supplement. So I wrote a supplement on the side.

Q Is what we're looking at that we've marked as Exhibit 2 -- is this the same supplement you wrote?

A Yes, same one.

Q Ordinarily when you're inputting information for incident reports, when are you supposed to write the incident report?

MR. BUCKLEY: Object to the form of question.

You can answer.

A When the situation happens. When the situation is over, write down your report, your incident report, and word it.

Q (By Mr. Smith) Was there any particular reason why your supplement was several days later than the incident itself?

A Well, usually most of the time, I don't get assisted to, like, post with computers. So most of the time, I'm assisted to open dorms. Open dorms have no type of computer ISD. You're always on your feet; so you don't get a chance to get on the computer. Usually -- I'm pretty sure it took me a couple of days to finish my report. I had it written down in my notebook, but I don't know where that notebook is at

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him this narrative directly?

A Yes.

Q When did he ask you to do that?

A The day I got interviewed by him.

Q Okay. What day was that?

A That, I don't remember.

Q Okay. Ordinarily, you know, in the jail when a medical emergency happens or there's a fight or something like that, you create incident reports; right?

A Yes.

Q Okay. When are you required to enter your information for an incident report?

A Whenever you're, like, there, whenever you're to assist. I was there to assist only because I think Ms. Tracey was the first one to find him. Jackson was second. I was there third. I wrote a supplement. That's what it's called.

So Ms. Tracey was the one -- she would have been the one to write the incident report, and I would have put myself in on the Odyssey. And you would have to go to the inmate. You had to click on "incident," click "new." You would have to click on the "plus" button, press "new location, date, name, time." Then go the narrative and then click on the "plus" sign, say "new incident" and then click on "narrative" again. And

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anymore.

Q So when you were walking around the jail and you had notebook on you?

A Yes.

Q Okay. Just to make sure I understand, was that common practice for everyone to have a notebook on them?

A No; it was just for me, like, to help me to assist myself.

Q Okay. In case -- well, one, would this be something you'd take home with you?

A Yes.

Q So this wasn't a notebook you left at work?

A Unh-unh.

MR. BUCKLEY: you have to say "yes" or "no."

A No. No.

Q (By Mr. Smith) What kind of stuff did you use the notebook for?

A Just for, like, language, like, to fix my punctuation on -- for -- like, for myself, my supplements. Or whenever I have to do an incident report, that's -- usually I edit it out. I write down my thing, look back at it again, read it, reread it, rewrite it, then make it look better on the Odyssey, you know.

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Q Okay. I don't want to presume anything. Is your first language Spanish, though?

A No, sir.

Q Okay. I just was asking because I wasn't -- you said you were speaking to someone else before the ATW.

A Yes.

Q But your first language is English?

A Yes.

Q But this is your way of improving your grammar, I guess, for the reports?

A Yes.

Q Okay. You say now you don't know where that notebook is?

A I know it's somewhere in my house.

Q Since this litigation, have you taken a look to see if you could find it?

A No, sir.

Q Okay. Was it the same notebook you were using when you had your last day in September?

A No.

Q You'd already run through that notebook around were on to a new one?

A Yes.

Q Well, that's helpful then maybe. Are these

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Q (By Mr. Smith) Okay.

A I don't take work with me.

Q You mentioned shredding it. Is there a shredder there at the booking station?

A Yes.

Q Okay. And you shred it at the booking station?

A No; I just throw it in the trash can.

Q Just a regular trash can?

A There's a trash can right by too.

Q Okay. The reason I'm asking, so when you would show it to the lieutenant so he could verify, like, what the count was, he didn't take a copy of that for himself?

A No; he usually didn't need it. Usually he writes it down on a separate sheet of paper which is the formal head-count piece of paper. So how could -- I don't know how the sheet looks like, but you have 6A, 6B, booking, medical, ISD, annex, and kitchen. Those are the only places you would take head count at.

Q So he had a sheet where he writes a total for all those?

A He'd look at what your sheet is, write the total down, and it would be verified by him.

Q Did he come in to verify your count?

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just -- are we talking about, like, just, like, a notebook that kind of fits in your hand, like a small -- you know, you can put in your pocket?

A It's like a regular full-size notebook.

Q So an 8-1/2-by-11 kind of notebook?

A Yes.

Q All right. Well, then when you're on shift, how do you take it around with you?

A We wear clear book bags.

Q Oh. On shift you're -- you can wear the backpack while you're --

A Yeah, so you can carry your personal things with you in the jail so, like, if you have, like, your personal snacks or food, you know, to help you through the day.

Q Yeah. Okay.

A But usually that notebook was for drawing. When you're in 6A, there's no -- there's not a computer. It's, like, boring.

Q You didn't -- like, with the reports and stuff -- like the Exhibit 1 we were talking about, you wouldn't stuff that in your notebook too?

THE WITNESS: Like, these?

MR. SMITH: Like, these, like Exhibit 1.

A No.

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A Yes.

MR. WAYMIRE: Can we take a break when you get a chance?

MR. SMITH: Yeah. Actually, this is a good as point. Let's go ahead and take a pause. Do you need five minutes. Does that sound good? Let's take five minutes. It's 2:15. We're going to be off for five minutes.

(A recess was taken.)

MR. SMITH: Back on the record. It's 1421.

Q (By Mr. Smith) All right, Mr. Gomez. Just wanted to jump back into this a little bit. Now, you gave this -- you wrote this statement -- this supplemental statement for the incident report; is that right?

A Yes.

Q And then you were -- you said you were interviewed by Lt. Tatum. Is that his rank?

A Yes, sir.

Q Were you interviewed by anyone else as a result of this incident? Not including your attorney, obviously.

A No.

Q Okay. At one point you also gave testimony to the merit board for Dep. Tracey; is that correct?

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1 A Yes.

2 THE WITNESS: Are you talking about where I
3 had to go to -- like, it was like a big screen of
4 people?

5 MR. SMITH: I would assume that's it. But I
6 can't tell you for sure if this was for more than one
7 incident. I can show you a picture of it, if that's
8 helpful.

9 THE WITNESS: That's fine.

10 Q (By Mr. Smith) Do you remember when you were
11 talking about this -- you were in this place with the
12 big screen, who was in there with you? Not on the
13 screen but in person.

14 A Major Tate, Lt. Tatum -- I don't remember
15 anybody else.

16 Q Okay.

17 A I don't know about those other people.

18 Q All right. Coming in here today -- and,
19 again, I don't want to know about any conversations you
20 had with Mr. Buckley, but coming in today did you review
21 any documents to help you prepare for the deposition?

22 A No.

23 Q Okay. Did you view any video to help you
24 prepare for the deposition?

25 A No.

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1 Q Again, besides Mr. Buckley, did you talk with
2 anyone to prepare for today's deposition?

3 A No.

4 Q I want to go ahead then and -- well, let's
5 roll back. As a result of what happened with Ezra, my
6 understanding was that you had a conversation with
7 someone at the jail about how you could have performed
8 better; is that correct?

9 A I don't remember.

10 MR. SMITH: All right. Let's just go ... I
11 can't digitally label things, so we will call this
12 Exhibit 3. It is from the merit board hearing. This is
13 the file that's marked with the date of 2024/08/30.
14 Look like the beginning time was 10:04:44, in case
15 anyone's curious what it looks like.

16 (Plaintiff's Exhibit No. 3 was marked for
17 identification.)

18 Q (By Mr. Smith) First of all, this screen of
19 folks that we see -- showing what we've labeled as
20 Exhibit 3, the screen of folks that we've seen here,
21 who's the gentleman in the top left-hand corner?

22 THE WITNESS: Talking about this area?

23 MR. SMITH: Yes; you're identifying the man in
24 the top corner.

25 A Oh, that's ... what's the -- do you know those

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1 gummies? I forgot what those gummies are called.
2 Welch's. Maj. Welch.

3 Q (By Mr. Smith) There we go. So Maj. Welch.
4 All right.

5 Now, is that you we see in the screen?

6 A Yes. My face looks so clear.

7 Q All right. So was the -- when you were
8 talking about the meeting that you had with the
9 television with the all the different faces on it, was
10 this the one you were referring to?

11 A Yes.

12 (A portion of a video file was played.)

13 Q (By Mr. Smith) Sorry. You recognize that as
14 being your voice; is that correct?

15 A Yes.

16 MR. SMITH: It's jacked all the way up; so I
17 apologize.

18 (A portion of a video file was played.)

19 MR. SMITH: Trying to get to the point I want
20 to make sure we understand.

21 (A portion of a video file was played.)

22 MR. SMITH: Sorry.

23 Q (By Mr. Smith) When you were giving this,
24 were you giving this -- giving your testimony under oath
25 in this particular hearing? Do you remember?

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1 A I don't remember.

2 (A portion of a video file was played.)

3 (A discussion was held off the record.)

4 Q (By Mr. Smith) So let's go back to that
5 answer there and get the question in so we understand
6 where you're coming from.

7 (Video recording played back.)

8 Q (By Mr. Smith) All right. So having played
9 your testimony from that merit board hearing, does that
10 help you remember what it was, the conversation you had
11 about how they went over it with you about how you
12 should handle the situation?

13 MR. BUCKLEY: Object to form of the question.
14 You may respond.

15 A No; I really don't remember all that.

16 Q (By Mr. Smith) You don't remember what it
17 was they talked to you about after the situation?

18 A No; I don't remember.

19 Q Do you remember who talked to you at all about
20 the situation after it happened besides Tatum?

21 A No; I don't remember anybody.

22 Q Was there any kind of debrief that morning
23 after you talked -- after the suicide attempt with any
24 of the lieutenants?

25 THE WITNESS: Like, what you mean?

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Q (By Mr. Smith) Like, after the situation happened, did Lt. Daniel or any other ranking officer pull you aside to kind of debrief you about what you'd just been through?

A Yes. Lt. Daniel asked me if I was okay, if mentally I was still here or, you know ...

Q And well, what else did you guys talk about besides that?

A How to go over the procedure and what to do next time.

Q Okay. What was your understanding coming away from that conversation about what to do next time?

A Made me look at the situation more clear and what should have been done.

Q All right. And what was that that should have been done?

A He should have been on suicide prevention.

Q Okay. Am I correct you could have -- after hearing him and Tracey, you could have instigated suicide prevention; is that right?

A Yes.

MR. BUCKLEY: I think "instigate" is the word we're having an issue with.

Q (By Mr. Smith) You could have began suicide-prevention protocols? Is that a better way of saying

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happening. Is that your understanding of how these cameras work as well?

A Yes.

Q And what are we seeing in the picture? What is being depicted?

A Seeing that I'm walking toward the Holding Cell 7.

Q Okay. But this is -- Generally speaking, this is the booking area of the Rockdale County Sheriff's Office?

A Yes.

Q So if you were booking out someone to be released, you would take them out of the cell like this?

A Yes.

MR. WAYMIRE: Can you tell the time stamps so somebody reading the transcript can know?

MR. SMITH: At this point we're at one hour and 50 minutes and 40 seconds. Excuse me. That's the other side. One hour 24 minutes and 14 seconds into the video. It's also 1:24 a.m. and 19 seconds as listed on time stamp at the top right.

Q (By Mr. Smith) So at this point you have an inmate that you're taking -- you mentioned taking someone to fingerprinting?

A Yes.

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it? You could have began suicide-prevention protocols or --

THE WITNESS: Can you repeat the whole question again? I'm sorry.

Q (By Mr. Smith) After you heard Ezra and Tracey, you could have began the suicide-prevention procedures; correct?

A Now that I'm looking back at it, yes, I could have.

(Plaintiff's Exhibit Nos. 4 and 5 were marked for identification.)

Q (By Mr. Smith) Okay. Okay. We will label -- that was 3. We will go ahead and do this as 4. And I'll just -- we'll put 5 down as well at the same time. So 4 we're going to call Cam 9 account security camera in the booking area. That shows a particular perspective of Holding Cell 7, and the other one is the intake-side camera.

Are you familiar with the security cameras there at the booking -- in the booking area of the jail?

A Yes; I'm familiar with them.

Q Okay. So I'm just going to ask you -- what I'm representing is the case here -- let me back up.

Okay. So Cam 9. This gives -- as I understand it, gives the date and time things are

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Q Do you see the fingerprinting station on this screen?

A No, but the fingerprint is this one in the corner.

Q It's to the right of where? The corner?

A Literally right where this little wall is, this little wall right in front of it.

Q So it's offscreen, but it's near to bottom right-hand corner of the screen we're looking at?

A Yes, sir.

Q So just a matter -- it looked like y'all went offscreen a different way. Do you dress people out before you fingerprint them?

A So when you're in intake, that's where they get dressed at too. So intake, they get the jail card, the Tech 84 which is the scan to make sure they don't have anything on them oralwise or the other way. And when they're finished with the Tech 84, they go in this room, and that's where they change out.

Q Okay.

A Yes.

Q But at this particular time if you're tack someone out to be process where are you will take?

A The fingerprint section is where the corner is. So in that corner there's, like, a ... there's,

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1 like, a cabinet that's, like, a big cabinet. It's
 2 filled with jumpsuits that you give to the inmates when
 3 they're finished being processed because on this section
 4 I have the high-risk scan. I forgot. There's, like, a
 5 big poster-covered wall on the wall where you can see
 6 how tall they are. Is he five-six, all that. And then
 7 you could also take his fingerprint, so fingerprinting
 8 machine. The mug shot camera points at him like that.

9 Q So my understanding is after you took that
 10 gentleman out of the cell, Ezra Smith started hitting
 11 the cell door.

12 Do you recall that?

13 A Yes.

14 Q Okay. And you didn't go to check on Ezra when
 15 he was hitting the door. Am I right about that?

16 A No.

17 Q But Dep. Tracey did; is that right?

18 A Dep. Tracey did; yes.

19 Q So for the record, same film. We're still on
 20 Cam 9, Exhibit 4. I forwarded to 1:28:13 or 1:28:18 on
 21 the time stamp.

22 Can you tell who that is in the screen?

23 A No.

24 Q Let me roll back just a little bit.

25 Do you recognize that person, that officer?

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1 MR. WAYMIRE: Object to form.

2 MR. BUCKLEY: Join.

3 You can answer.

4 A I don't remember that.

5 Q (By Mr. Smith) We're at 1:28:54. You're
 6 basically at Holding Cell 7 now; right?

7 A Yes.

8 Q Okay. I'm going to represent to you that's
 9 Dep. Tracey so we can kind of finish this conversation.

10 Seeing this, do you recall why it was you went
 11 to Holding Cell 7 while Tracey was talking to Ezra
 12 Smith?

13 A I don't even remember why I walked over there
 14 in the first place.

15 Q But, obviously, you're not at the
 16 fingerprinting station?

17 A Yeah.

18 Q Okay. We see -- we're at 1:29:04. You're
 19 walking away now; right?

20 A Yes.

21 Q Do you know where you were walking off to?

22 A To the fingerprint section/area.

23 Q So you went down Holding Cell 7, and you come
 24 back?

25 A Yes.

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1 MR. BUCKLEY: I think maybe if you go back two
 2 clicks, you can see her face.

3 MR. SMITH: Almost. Let's see.

4 A No; I don't know who that is.

5 MR. BUCKLEY: Go forward one. Just one.

6 Q (By Mr. Smith) You don't recognize that
 7 person?

8 A No; I don't know who that is.

9 Q Okay. We're at 1:28:15.

10 Okay. Now, where that person is approaching,
 11 is that Holding Cell 7?

12 A Yeah; that's 7.

13 Q So we're at 1:28:25. Can you tell me who the
 14 inmate is, the person talking with --

15 A No. I don't -- I can't really see the face,
 16 but I don't know who that is.

17 Q Okay. That's you at the bottom of the screen?
 18 Is that you now that we're at 1:28:43?

19 A Yes.

20 Q Okay. So you're going to guard Holding Cell 7
 21 here; is that right?

22 A Yes.

23 Q And that's at 1:28:47. Do you remember that
 24 evening Tracey making the hanging gesture to Ezra Smith
 25 with her left hand?

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1 Q All right. And what you're telling me, you
 2 went back to the fingerprinting station where there was
 3 an inmate waiting to get fingerprinted?

4 A Yes.

5 Q How far was it from where Holding Cell 7 and
 6 fingerprinting station -- let's start with the
 7 fingerprinting station. Could you contact your
 8 lieutenant from that station?

9 THE WITNESS: From the fingerprint station,
 10 could I contact him?

11 MR. SMITH: Mm-hm.

12 A No.

13 Q (By Mr. Smith) No?

14 A His office is, like, by medical's office.

15 Q Okay. You didn't have a radio or anything
 16 that you could use to contact him from there?

17 A I don't remember.

18 Q If you had to get hold of someone at that
 19 point in time, how would you have done it?

20 A The phones that we have at our booth.

21 Q You mean the platform?

22 A Yeah, the platform. Yeah.

23 Q You could have grabbed a phone at the platform
 24 and called?

25 A Yes.

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1 Q If you were going to start a 52 call, how do
2 you -- like, what's -- how do you start that process?

3 A Well, whoever walked onto the process or
4 whoever was the first at the scene would have to --
5 what's that called? -- not escalate but ... try to
6 handle the situation, like, getting control of the
7 situation.

8 Q How do you alert others to the fact that there
9 is a 52?

10 A Well, usually you --

11 THE WITNESS: Like, can you repeat that again?

12 MR. SMITH: Yeah.

13 Q (By Mr. Smith) How do you tell other
14 officers in the jail that there's a 52 or attempted 52?

15 A Well, we would ... well, we would first call
16 the nurse, and we would confirm with her if she wants
17 them on 52 watch or not.

18 Q While you're at the fingerprinting, you're
19 relatively close to the nurses office?

20 A No. So the fingerprint is right here on the
21 other side. So medical is right by intake.

22 Q So it's the other side of the booking area?

23 A Yes, is right by intake. And literally right
24 beside intake is Lt. Daniel and then medical.

25 Q Okay. So when you were down in the Holding

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1 to get it out your mind. She said if I was, like,
2 mentally okay or if I was, like, you know, mentally
3 there, to keep going on, finish all the shift. I was,
4 like, I'm mentally able to. She was constantly checking
5 on me, making sure I was okay.

6 Q Did you check on her to see if she was okay?

7 A Yes. I would go check: "How you doing? You
8 Okay? You feel good?" Yeah.

9 Q Did she give any indication that she was
10 having trouble with what happened?

11 THE WITNESS: Like, as in mentally or did --

12 MR. SMITH: Yeah, processing what happened.

13 A No. She wasn't giving no signs or anything.

14 Q (By Mr. Smith) Okay. Did she tell you
15 anything about the event and what she'd heard or seen?

16 THE WITNESS: Like, from her perspective when
17 she got up there first?

18 MR. SMITH: Yeah.

19 A No.

20 Q (By Mr. Smith) What about Tracey? Did Tracey
21 tell you why she did what she did that night?

22 A No.

23 Q Did you talk to -- did you text with Tracey at
24 all after that happened?

25 A I don't remember.

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1 Cell 7, for example, you would have -- if you're facing
2 the door, you would have taken a right and just gone
3 down that little hallway. And you could have talked
4 to --

5 A Yeah.

6 Q Okay. All right. Did you -- after that night
7 after that shift was over, did you talk with anyone that
8 next week or so -- did you talk with either Jackson or
9 with Tracey about what happened that night?

10 MR. BUCKLEY: Object to form. Asked and
11 answered.

12 You may answer.

13 A Yes, but I don't remember about the
14 conversation too much.

15 Q Did you text with them at all?

16 A I don't remember.

17 Q Did you -- I mean did you have an ongoing text
18 conversation with Jackson?

19 A I don't remember that.

20 Q Okay. You mentioned that she was really
21 helpful in the past. Was she helpful following the
22 events of Ezra Smith's attempted suicide?

23 A Yes.

24 Q How?

25 A Well, she told me to try to get some rest, try

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1 Q Okay. Did you ever talk to Sanchez outside of
2 work?

3 A No.

4 Q Okay. So you wouldn't have any text
5 conversation with Sanchez either about what happened
6 that nights?

7 A No.

8 Q When does her shift normally end in the
9 morning?

10 A I think the nurses leave, like, an hour
11 before -- no. We leave an hour -- I believe their shift
12 ends at 7:00 because they come around 7:00 during --
13 when we begin our shift. So I would assume they will,
14 like, leave, like -- because that's usually how our time
15 is, 6:00 to 6:00. So I believe theirs would be 7:00 to
16 7:00.

17 Q She's still there when you're leaving?

18 A Yeah. Yes, sir.

19 Q You mentioned that the preshift briefing that
20 they would have told you about medical issues. Did
21 anyone mention Ezra Smith during that part of the
22 preshift briefing?

23 A I don't remember.

24 Q Okay. Because am I right that when you go
25 through intake, there's also like a medical -- like,

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1 a -- some kind of interaction with medical at intake?

2 A Yes. I don't know what the questions are, but
3 they do end up coming to them in intake and asking them
4 questions. I don't know what specifically what
5 questions, but they do end up talking to them when they
6 come in during intake.

7 Q Okay.

8 A That's the only way the officer is able to
9 leave intake.

10 Q What do you mean?

11 A The nurse has to see the guy that they brought
12 in first.

13 Q Okay. Okay.

14 A Like, the nurse has to see him unless there
15 is --

16 Q All right. Have you ever been working intake
17 when someone was told they couldn't go into booking?

18 A No.

19 Q Ezra was there -- well, he was there since you
20 began the shift; is that right?

21 A Yes.

22 Q And on his card would have told you when he
23 first came into the Rockdale County jail; is that
24 correct?

25 A Yes.

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1 A No; she didn't tell me nothing.

2 Q Did you ever hear Jackson tell you that -- or
3 excuse me.

4 Did Jackson -- or did you hear Jackson tell
5 anyone else that Ezra was a privileged white guy?

6 A That -- I don't remember her saying anything
7 like that.

8 Q And as far as you understand, why was Ezra the
9 last person to be processed in that cell?

10 A That reason, I really don't know either.

11 Q Did you ever meet Ezra before that night?

12 A No, sir.

13 Q Have you ever seen Ezra after that night?

14 A No, sir.

15 Q Tracey also mentioned to us that after this
16 was all over that you were laughing about what happened.
17 Do you remember that?

18 A I remember going up to her, but I don't
19 remember any of the conversations.

20 Q Okay. I want to just make sure that I don't
21 have anything left. I'm almost done, Mr. Gomez. We're
22 going to wrap up here real soon. So I'm going to ask
23 you ask just to indulge me with another five minutes so
24 we don't have anything else. Once we do, the other
25 attorneys here may have questions for you. If they do

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1 Q All right. So when you're looking at a file,
2 you see that card?

3 THE WITNESS: The jail card?

4 MR. SMITH: Yeah.

5 A Yeah; it's, like, an index card.

6 Q (By Mr. Smith) Okay. So did you end up
7 processing his file eventually?

8 A I don't know about that. I don't remember.

9 Q Okay. Did you pick it up at all that night?

10 A I don't remember.

11 Q Tracey and Jackson were both helping you
12 process people in the booking area; is that correct?

13 A Yes.

14 Q All right. Were you talking with Jackson that
15 night about the different people that you guys were
16 processing?

17 A Yes, but I don't remember the conversation.

18 Q Well, our understanding from Tracey at least
19 was that Jackson told you not to process Ezra; is that
20 right?

21 A I don't remember that.

22 Q You don't remember?

23 A No.

24 Q Did Jackson tell you about the last time she'd
25 seen Ezra at the jail?

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1 we'll let them ask those. And I may have a couple
2 afterwards. It shouldn't be much longer now. I do
3 appreciate it.

4 Do you have anywhere that you need to be?

5 A I'm good.

6 Q Okay. All right. Then just give me another
7 five minutes, make sure I'm not missing anything else.

8 (A recess was taken.)

9 MR. SMITH: We can wrap up real quick. Just
10 to make sure I understand -- and before I get into that,
11 Thank you very much for your time today. We do
12 appreciate you coming in.

13 Q (By Mr. Smith) All right. So just really
14 quick to walk through, if I understood you correctly
15 today, we saw in the video that you pulled somebody out
16 right before Tracey -- eventually before Tracey goes
17 down and talked to Ezra.

18 You were the person pulling that person to get
19 fingerprinted?

20 A Yes.

21 Q When you pulled him out, you would have known
22 that Ezra is the only person left in the cell?

23 A Yes.

24 Q And you knew that in that Holding Cell 7,
25 there is a telephone right on the wall?

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1 A Yes.
 2 Q With a cord?
 3 A Yes.
 4 Q All right. And then you heard Ezra say that
 5 he was suicidal?
 6 A Yes.
 7 Q And you heard Tracey say, "Do it. I want you
 8 to be a man about it," or something to that effect?
 9 MR. BUCKLEY: I'll object to the form of that,
 10 "something to the effect." His testimony is what it is.
 11 MR. VEAL: I join.
 12 Q (By Mr. Smith) After hearing that, you
 13 didn't go to medical; right?
 14 A Yeah.
 15 Q Did you go to medical?
 16 A No, no, no. No; I didn't go to medical.
 17 Q And you didn't talk to Lt. Daniel?
 18 A No, sir. I wasn't the first to enter the
 19 situation.
 20 Q So you're saying that Tracey was the first to
 21 enter the situation? Is that what you're telling me?
 22 A Yes.
 23 Q And so you didn't feel that you had a duty to
 24 talk to anyone since Tracey was there?
 25 A Yes.

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1 THE WITNESS: Like, duty to like tell about
 2 Mr. Ezra Smith?
 3 MR. SMITH: Yeah.
 4 THE WITNESS: Like, if I had to go tell them?
 5 MR. SMITH: Let's stop using "them" maybe.
 6 Q (By Mr. Smith) I'm looking to understand
 7 what you're telling me right now in terms of -- you told
 8 me that you didn't talk to medical and that you didn't
 9 go to Lt. Daniel to tell him about what Ezra Smith said
 10 about being suicidal.
 11 Tell me why you didn't think you had to.
 12 A Well, honestly, when I heard that situation
 13 with him and Ms. Tracey going on, I didn't think Inmate
 14 Ezra Smith was going to actually, you know, do anything
 15 because at the moment I thought they were just arguing
 16 with each other, like, a normal argument.
 17 Q Is it your understanding of the suicide
 18 prevention and interventions policy that you don't
 19 report when someone -- when you don't believe someone --
 20 excuse me.
 21 You don't have to report when you think
 22 someone is just arguing and saying their suicidal?
 23 THE WITNESS: Can you break it down a little
 24 easier?
 25 Q (By Mr. Smith) You've seen the policy

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1 before; right?
 2 A Yes.
 3 Q Okay. Let me if I still have my pen anywhere
 4 on me. Let's see. That puts us at?
 5 THE COURT REPORTER: I believe we're at 6.
 6 MR. SMITH: 6?
 7 (Plaintiff's Exhibit No. 6 was marked for
 8 identification.)
 9 MR. BUCKLEY: Okay.
 10 Q (By Mr. Smith) Do you recognize this
 11 document, Mr. Gomez?
 12 A Yes.
 13 Q All right. What is it?
 14 A Jail policy and procedure.
 15 Q Okay. And what's the jail policy and
 16 procedure about?
 17 A Jail suicide procedure.
 18 Q I'm trying to understand. You're telling me
 19 if you hear someone say they're suicidal, you don't have
 20 to report that necessarily?
 21 A You do have to report it, but -- yeah; you do
 22 have to report it.
 23 Q Okay. But in this particular incident, you
 24 did not?
 25 A Yes.

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1 Q Okay. And Jackson was there in booking as
 2 well; correct?
 3 A Yes.
 4 Q You didn't talk to her to ask her any
 5 questions about whether or not you had to report it or
 6 not; is that right?
 7 A No; I didn't talk to her about it.
 8 MR. SMITH: Okay. All right. That is all of
 9 my questions for this afternoon. I don't believe if, I
 10 understand correctly --
 11 MR. BUCKLEY: I do have a question
 12 EXAMINATION
 13 BY MR. TIMOTHY J. BUCKLEY:
 14 Q With respect to this document that you were
 15 just shown, what, if any, difference is there of what
 16 you thought your duty was on the day of the incident
 17 with Ezra Smith versus after you were counseled about
 18 what you're supposed to do?
 19 Do you understand my question?
 20 THE WITNESS: Break it down a little.
 21 Q (By Mr. Buckley) Did you think your duty on
 22 the day Ezra Smith was having this interaction with
 23 Ms. -- with Dep. Tracey, did you at that moment think
 24 you had a duty to report it --
 25 MR. SMITH: Object to form.

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Q (By Mr. Buckley) -- at that moment?

MR. BUCKLEY: Still object to the form.

A Yes.

Q Did you?

A Yes.

Q Okay. So you're -- when you earlier testified you thought they were just arguing --

A Yeah, but I thought they were just arguing.

Q But you thought you were still supposed to report it and didn't at that time?

MR. SMITH: Object to the form.

A No.

MR. BUCKLEY: Okay. Stop. He objected to my question. Let's start over.

Q What, if any, difference is there between what you thought at the time you had to report versus what you thought you had to report once you were counseled about it after the incident?

A So as I remember, Tracey was at the podium, and there was just arguing back and forth over and over for, like, a split -- five minutes with Ezra Smith. Well, Ezra Smith was at the door just banging it and banging at the door talking to them.

Q Okay. But in terms of your duty at that time, what, if any, differences were there between what you

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the four-panel hard copy with the index.

MR. WAYMIRE: I don't need a copy, thanks.
(Deposition concluded at 3:09 p.m.)

Page 86

thought your duty was right then versus what you came to know your duty was once you were counseled by a superior afterwards?

Is there a difference?

MR. SMITH: Object to form.

A Yes.

Q (By Mr. Buckley) All right. Tell us the difference.

A Should have been reported.

Q You know that now?

A Yeah.

Q At the time you heard this exchange with them --

A I didn't.

Q -- did you think you needed to report it?

A No, I did not.

MR. SMITH: Object to form.

MR. BUCKLEY: That's all the questions I have.

MR. WAYMIRE: No questions.

MR. VEAL: None from me.

THE COURT REPORTER: Transcribed?

MR. SMITH: Give us a second. Do you have anything? No? We'll take etran.

MR. VEAL: Same.

MR. BUCKLEY: I want etran, but I also want

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JURAT

RAUL GOMEZ

Notary Public

Sworn and Subscribed to me

This _____ day of _____.

1 CERTIFICATE

2
3 GEORGIA:

4 FULTON COUNTY:

5
6 I hereby certify that the foregoing deposition was
7 stenographically recorded by me as stated in the caption,
8 and the colloquies, questions and answers were reduce to
9 typewriting under my direction; that the foregoing transcript
10 is a true and correct record of the evidence given.11 The above certification is expressly withdrawn and
12 denied upon the disassembly or photocopying of the foregoing
13 transcript, unless said disassembly or photocopying is done
14 under the auspices of BULL AND ASSOCIATES, INC., Certified
15 Court Reporters, and the signature and original seal is attached
16 thereto.17 I further certify that I am not a relative, employee,
18 attorney or counsel of the parties, nor am I a relative or
19 employee of such attorney or of any party, nor am I financially
20 interested in the outcome of the action.21
22 This 6th day of October, 2025.23
24 MEG ARMISTEAD

25 Certified Court Reporter ((B-2011))

My commission expires March 31, 2026

1 DISCLOSURE

2
3 Pursuant to Article 10.B of the Rules and Regulations of
4 the Judicial Council of Georgia, I make the following disclosure:5 I am a Georgia Certified Court Reporter. I am here as a
6 representative of BULL AND ASSOCIATES, INC.7 Bull and Associates, Inc. was contacted to provide court
8 reporting services for this deposition. Bull and Associates, Inc.
9 will not be taking this deposition under any contract that is
10 prohibited by O.C.G.A. 9-11-28 (c), O.C.G.A. 15-14-37(a) and (b).11 Bull & Associates, Inc. has no contract/agreement to provide
12 reporting services with any party to the case, any counsel in the case,
13 or any reporter or reporting agency from whom a referral might have
14 been made to cover this deposition.15 Bull & Associates, Inc. will charge its usual and customary
16 rates to all parties in the case, and a financial discount will not
17 be given to any party to this litigation.

18 OFFICIAL CODE OF GEORGIA ANNOTATED 15-14-37

- 19 (a) Contracts for court reporting services, not related to a
-
- 20 particular case or reporting incident, between a certified
-
- 21 court reporter or any person with whom a certified court
-
- 22 reporter has a principal and agency relationship and any
-
- 23 attorney at law, party to an action, or party having a
-
- 24 financial interest in an action, are prohibited. Attorneys
-
- 25 shall not be prohibited from negotiating or bidding reasonable
-
- fees for services on a case-by-case basis.
-
- (b) In order to comply with subsection (a) of this Code Section,
-
- each certified Court Reporter shall make inquiry regarding
-
- the nature of the contract for his or her services directed
-
- to the employer or the person or entity regarding said
-
- Court Reporter's services as an independent contractor.

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 6:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	7	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	269	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	31	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	2	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	10	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
138924	[REDACTED]	7BHC07	0	Rockdale County SO
139024	[REDACTED]	7BHC07	0	Rockdale County SO

Total Booking Holdir 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
156619	[REDACTED]	7BHC08	0	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
078921	[REDACTED]	7BHC09	45	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	68	Rockdale County SO

Total Booking Holdir 1

Printed on 05/06/2025 11:06 AM

PLAINTIFF'S
EXHIBIT

1

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 6:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	35	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	204	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	11	Conyers PD.
138424	[REDACTED]	Trans1	1	Conyers PD.
143019	[REDACTED]	Trans1	3	Conyers PD.

Total Transport Cell: 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	77	Rockdale County SO
36233	[REDACTED]	Trans2	91	Rockdale County SO

Total Transport Cell: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	33	Rockdale County SO

Total Transport Cell: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	394	Conyers PD.

Total Transport Cell: 1

Total Main Jail: 19

Total Inmates: 19

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 7:00 PM Sorted By: Cell Cells Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	7	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	21	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	269	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	31	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	2	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	10	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
138924	[REDACTED]	7BHC07	0	Rockdale County SO
139024	[REDACTED]	7BHC07	0	Rockdale County SO

Total Booking Holdir 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
156619	[REDACTED]	7BHC08	0	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	45	Rockdale County SO

Total Booking Holdir 1

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 7:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	68	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	35	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	204	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	11	Conyers PD.
138424	[REDACTED]	Trans1	1	Conyers PD.
143019	[REDACTED]	Trans1	3	Conyers PD.

Total Transport Cell 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	77	Rockdale County SO
36233	[REDACTED]	Trans2	91	Rockdale County SO

Total Transport Cell 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	33	Rockdale County SO

Total Transport Cell 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	394	Conyers PD.

Total Transport Cell 1

Total Main Jail: 20

Total Inmates: 20

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 8:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	7	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	21	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	269	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	31	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	2	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	10	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
138924	[REDACTED]	7BHC07	0	Rockdale County SO
139024	[REDACTED]	7BHC07	0	Rockdale County SO

Total Booking Holdir 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
156619	[REDACTED]	7BHC08	0	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	45	Rockdale County SO

Total Booking Holdir 1

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 8:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	68	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	35	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	204	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	11	Conyers PD.
138424	[REDACTED]	Trans1	1	Conyers PD.
143019	[REDACTED]	Trans1	3	Conyers PD.

Total Transport Cell 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	77	Rockdale County SO
36233	[REDACTED]	Trans2	91	Rockdale County SO

Total Transport Cell 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	33	Rockdale County SO

Total Transport Cell 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	394	Conyers PD.

Total Transport Cell 1

Total Main Jail: 20

Total Inmates: 20

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 9:00 PM Sorted By: Cell Cells Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	7	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	21	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	269	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	31	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	2	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	10	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
138924	[REDACTED]	7BHC07	0	Rockdale County SO
139024	[REDACTED]	7BHC07	0	Rockdale County SO

Total Booking Holdir 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
156619	[REDACTED]	7BHC08	0	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	45	Rockdale County SO

Total Booking Holdir 1

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 9:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	68	Rockdale County SO

Total Booking Holdin: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	35	Conyers PD.

Total Booking Holdin: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	204	Rockdale County SO

Total Booking Holdin: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	11	Conyers PD.
138424	[REDACTED]	Trans1	1	Conyers PD.
143019	[REDACTED]	Trans1	3	Conyers PD.

Total Transport Cell: 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	77	Rockdale County SO
36233	[REDACTED]	Trans2	91	Rockdale County SO

Total Transport Cell: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	33	Rockdale County SO

Total Transport Cell: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	394	Conyers PD.

Total Transport Cell: 1

Total Main Jail: 20

Total Inmates: 20

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 10:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	7	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	21	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	269	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member, Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	31	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	2	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	10	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
138924	[REDACTED]	7BHC07	0	Rockdale County SO
139024	[REDACTED]	7BHC07	0	Rockdale County SO

Total Booking Holdir 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	45	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	68	Rockdale County SO

Total Booking Holdir 1

Inmate List Report

GAROCKDALEPROD

As of: 07/08/2024 10:00 PM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	35	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	204	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	11	Conyers PD.
138424	[REDACTED]	Trans1	1	Conyers PD.
143019	[REDACTED]	Trans1	3	Conyers PD.

Total Transport Cell: 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	77	Rockdale County SO
36233	[REDACTED]	Trans2	91	Rockdale County SO

Total Transport Cell: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	33	Rockdale County SO

Total Transport Cell: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	394	Conyers PD.

Total Transport Cell: 1

Total Main Jail: 19

Total Inmates: 19

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 12:00 AM Sorted By: Cell Cells: Booking

Nodes Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	8	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	22	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	270	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member, Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	32	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	3	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	11	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
022121	[REDACTED]	7BHC07	1	Rockdale County SO
138924	[REDACTED]	7BHC07	1	Rockdale County SO
139024	[REDACTED]	7BHC07	1	Rockdale County SO
139124	[REDACTED]	7BHC07	1	Conyers PD.
139224	[REDACTED]	7BHC07	1	Conyers PD.

Total Booking Holdir 5

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	46	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
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Printed on 05/06/2025 11:10 AM

Page 1 of 2

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 12:00 AM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	69	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	36	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	205	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	12	Conyers PD.
138424	[REDACTED]	Trans1	2	Conyers PD.
143019	[REDACTED]	Trans1	4	Conyers PD.

Total Transport Cell: 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	78	Rockdale County SO
36233	[REDACTED]	Trans2	92	Rockdale County SO

Total Transport Cell: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	34	Rockdale County SO

Total Transport Cell: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	395	Conyers PD.

Total Transport Cell: 1

Total Main Jail: 22

Total Inmates: 22

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 1:00 AM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	8	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	22	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	270	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; Inmate Separations Exist

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	32	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	3	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	11	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
022121	[REDACTED]	7BHC07	1	Rockdale County SO
138924	[REDACTED]	7BHC07	1	Rockdale County SO
139124	[REDACTED]	7BHC07	1	Conyers PD.
139224	[REDACTED]	7BHC07	1	Conyers PD.
139324	[REDACTED]	7BHC07	0	Rockdale County SO
164822	Smith, Ezra	7BHC07		Rockdale County SO

Total Booking Holdir 6

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	46	Rockdale County SO

Total Booking Holdir 1

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 1:00 AM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	69	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	36	Conyers PD.

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46809	[REDACTED]	7BHC14	205	Rockdale County SO

Total Booking Holdir 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	12	Conyers PD.
138424	[REDACTED]	Trans1	2	Conyers PD.
143019	[REDACTED]	Trans1	4	Conyers PD.

Total Transport Cell 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	78	Rockdale County SO
36233	[REDACTED]	Trans2	92	Rockdale County SO

Total Transport Cell 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	34	Rockdale County SO

Total Transport Cell 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	395	Conyers PD.

Total Transport Cell 1

Total Main Jail: 23

Total Inmates: 23

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 2:00 AM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
253111	[REDACTED]	7BHC01	8	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
123324	[REDACTED]	7BHC02	22	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
202523	[REDACTED]	7BHC03	270	Rockdale County SO

Jailing Flags: Gang Member - Blood gang member; Inmate Separations Exist

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
115224	[REDACTED]	7BHC04	32	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
137224	[REDACTED]	7BHC05	3	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130924	[REDACTED]	7BHC06	11	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
139324	[REDACTED]	7BHC07	0	Rockdale County SO
164822	Smith, Ezra	7BHC07		Rockdale County SO

Total Booking Holdir: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
079921	[REDACTED]	7BHC09	46	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
136323	[REDACTED]	7BHC10	69	Rockdale County SO

Total Booking Holdir: 1

Inmate List Report

GAROCKDALEPROD

As of: 07/09/2024 2:00 AM Sorted By: Cell Cells: Booking

Nodes: Main Jail

Main Jail

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
153216	[REDACTED]	7BHC13	36	Conyers PD.

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
46609	[REDACTED]	7BHC14	205	Rockdale County SO

Total Booking Holdir: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
130424	[REDACTED]	Trans1	12	Conyers PD.
138424	[REDACTED]	Trans1	2	Conyers PD.
143019	[REDACTED]	Trans1	4	Conyers PD.

Total Transport Cell: 3

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
330607	[REDACTED]	Trans2	78	Rockdale County SO
36233	[REDACTED]	Trans2	92	Rockdale County SO

Total Transport Cell: 2

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
113724	[REDACTED]	Trans3	34	Rockdale County SO

Total Transport Cell: 1

SO #	Inmate's Name	Cell	Confinement	Arresting Agency
082022	[REDACTED]	Trans4	395	Conyers PD.

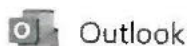
Total Transport Cell: 1

Total Main Jail: 19

Total Inmates: 19

12/23/24, 12:30 PM



Mail - Kevin Tatum - Outlook

**Statement Deputy Gomez #3062****From** Raul Gomez <Raul.Gomez@RockdaleCountyGA.gov>**Date** Sat 7/13/2024 9:20 PM**To** Kevin Tatum <Kevin.Tatum@RockdaleCountyGA.gov>

On July 8, 2024 I Deputy Gomez #3062 assigned as Booking Deputy

I Deputy Gomez was in booking with Deputy Jackson as kitchen and Deputy Tracey as Movement Deputy. When we enter booking for our post there was a lot of people to be booked in and there was also ATW that needed to be gone. Our main priority was the ATW so we focused on them first. We finished up most of the ATW holding cell 7. While I was doing ATW folders, I went to get inmate Ladaniel first because his bond was paid and made him into a ATW. While trying to process him into the system inmate Ezra was banging on the door with his feet and hands for 10 mins straight. Deputy Tracey goes down to holding cell 7 and explains why he isn't being processed in the system. Inmate Ezra continues to bang on the holding cell door 7 and yells out I'm suicidal. Inmate Ezra keeps yelling and gets into an argument with Deputy Tracey. Inmate Ezra tells Deputy Tracey; I'm going to kill myself then Deputy Tracey replies back by saying Do it then 4x and also saying I want to see you do it and be a man about. Then booking gets quite for 10 mins. Deputy Tracey checks the cameras and doesn't see inmate Ezra on the cameras. Deputy Tracey then goes down and checks booking cell 7 and finds inmate Ezra Kneeled down with the phone cord wrapped around his neck. Then Deputy Tracey calls out I need emergency help out loud and I deputy Gomez at the moment was taking Fingerprints of ATW Ladaniel. Then I run toward the scene in holding cell then I tell the 2 ATW to go into holding cell 8 and close the door. Then I see nurse Sanchez coming into holding cell 7 and starts CPR on inmate Ezra for 3 mins then Deputy Jackson tags in and does CPR and for 3 mins then L.T. Daniels comes to the scene and tells me to go run and get the nurses. So, I Leave, and I run to the booking door main and as I was opening the door I see the nurse running across the hallway Nurse Smith, Nurse Nypera . So, I deputy Gomez held the door open for the nurse then I run behind them as we arrive the scene Nurse Sanchez is still giving CPR. L.T. Daniels then jumps in and does CPR to inmate Ezra for 2 mins and finally he comes back. Behind me Deputy Renfro 3064 and Deputy Rowe and Cpl Hall arrive at the scene Ms. Lewis the Tec calls for medical help over the phone. Medical help arrives and takes inmate Ezra to the hospital Deputy Little and Deputy Dieudonne follow them to make sure inmate Ezra was okay. L.T. Daniels then takes pictures of evidence, and we sent the inmate work to clean up the mess.



ROCKDALE COUNTY SHERIFF'S OFFICE				JAIL POLICY AND PROCEDURE	
GENERAL ORDER NO:	5.22	EFFECTIVE DATE:	APRIL 23, 2024	REVISION DATE:	
SUBJECT:		SUICIDE PREVENTION AND INTERVENTION		NO OF PAGES: 3	RESCINDS:
				REFERENCES: 5-ALDF-4C-05,31, & 32	
		BY ORDER OF THE SHERIFF		 ERIC J. LEVEY, SHERIFF OF ROCKDALE COUNTY	

PURPOSE:

The purpose of this policy is to ensure that all inmates admitted to the Rockdale County Jail are screened in order to identify those inmates who may require immediate mental health or who pose a health or safety risk to themselves or others.

POLICY:

It shall be the policy of the Rockdale County Sheriff's Office (RCSO) to provide procedures that define the specific mode of prevention, intervention and response necessitated by the occurrence of a Mental Health related crisis and/or demonstration of suicide ideation by an inmate.

A suicide prevention program is approved by the Medical Provider and reviewed by the facility or program administrator. It includes specific procedures for handling intake, screening, identifying, and supervising of a suicide-prone inmate and is signed and reviewed annually. The program includes staff and inmate critical incident debriefing that covers the management of suicidal incidents, suicide watch, and death of an inmate or staff member. It ensures a review of critical incidents by administration, security, and medical services. All staff with responsibility for inmate supervision are trained on an annual basis in the implementation of the program. Training includes but is not limited to:

- A. Identifying the warning signs and symptoms of impending suicidal behavior.
- B. Understanding the demographic and cultural parameters of suicidal behavior.
- C. Responding to suicidal and depressed inmates.
- D. Communication between Jail Administration and Medical Provider.
- E. Using referral procedures.
- F. Housing observation and suicide watch level procedures.
- G. Follow-up monitoring of inmates who make a suicide attempt.
- H. Population specific factors, pertaining to suicide risk in the facility.

I. Suicide Response:

- A. Any inmate who threatens or attempts self-mutilation or suicide will be viewed as a MENTAL HEALTH EMERGENCY. Upon notification, the Mental Health Professional will provide a face-to-face interview with the inmate. Additionally, the inmate's mental health and/or medical chart(s) will be reviewed as part of the initial assessment.
 - 1. The assessment will be completed in a timely manner during normal working hours after receiving notification.

2. At times other than normal working hours, Jail staff will notify the Medical Department which will provide immediate medical intervention. The Medical Staff will contact the on-call Mental Health Professional for notification purposes.
- B. Based upon the inmate's assessment, a decision will be made by Mental Health Professional regarding the appropriate housing for the affected inmate. Options for appropriate housing may include:
 1. Maintenance within the currently assigned Housing Unit
 2. Relocation to the Booking/Medical Unit
 3. Transport to outside medical facility (ER Unit)
 4. Following review and medical clearance may be transferred to an offsite facility to meet the current mental health needs of the inmate in crisis. (i.e. Georgia Regional Hospital)
- C. If the use of restraints is indicated, then the restraints will be applied as provided for by existing policy.
- D. The inmate may also be placed on a "Suicide Watch" to monitor his/her behavior. The frequency of the "Special Watch" may be staggered in person checks not to exceed 15-minute intervals. The watch is conducted to assure the continued well-being of the inmate. The watch will be documented by Detention staff on the appropriate "Suicide Watch" forms, as well as in Eagle. Notations will be made of any abnormal behavior observed. The watch will be reviewed by the medical staff to determine the need for continuance, at a minimum of every twelve (12) hours.
- E. When standard issued clothing presents a security or medical risk the inmate is supplied with a security garment that promotes inmate safety and prevents humiliation and degradation.
- F. When a "Suicide Watch" is initiated, the inmate will be placed in an observation (booking/medical/segregation) cell without any of their personal possessions, clothing and/or linen from the bedding to prevent the use for self-injury. The use of safety garments will be provided to the inmate to prevent additional self-injury. Inmates are protected from humiliation and degradation.

The decision to return any items will rest on the Mental Health Professional, or their designees. This decision will be documented on the appropriate forms.

ONLY DETENTION STAFF WILL ENTER THE INMATE'S ROOM/CELL TO REMOVE THESE ITEMS.

- G. Inmates placed on Suicide Watch will be evaluated by a Mental Health Professional for an alternative safety meal (Nutra-Loaf). The alternative safety meal must be approved in writing by the medical provider or their designee. All meals will meet basic nutritional requirements and occur with the written approval of jail administrator or their designee and the Medical Authority. Alternative safety meals will not exceed seven days.
- H. If and when any of the items are returned to the inmate, the inmate will be closely monitored. The returns of any possessions are solely at the discretion of the Mental Health Professional.
- I. Inmates shall also be afforded the opportunity to utilize showers. (Daily, based on the

Mental Health Professional authorization and the behavior of the inmate).

II. POLICY REVIEW:

This policy and procedure will be reviewed and updated as needed.